

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

ASSOCIATION OF NEW JERSEY RIFLE  
& PISTOL CLUBS, INC., BLAKE  
ELLMAN, and MARC WEINBERG,

Plaintiffs,

v.

MATTHEW PLATKIN, in his official capacity as Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey Division of State Police, RYAN MCNAMEE, in his official capacity as Chief of Police of the Chester Police Department, and JOSEPH MADDEN, in his official capacity as Chief of Police of the Park Ridge Police Department,

Defendants.

MARK CHEESEMAN, TIMOTHY CONNELLY, and FIREARMS POLICY COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Acting Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey

HON. RENÉE M. BUMB

Civil Action No.  
3:18-cv-10507

**(ELECTRONICALLY FILED)**

**JOINT MOTION FOR  
EXTENSION OF STAY PENDING  
APPEAL**

HON. RENÉE M. BUMB

Civil Action No.  
1:22-cv-4360

State Police, CHRISTINE A.  
HOFFMAN, in her official capacity as  
Acting Gloucester County Prosecutor,  
and BRADLEY D. BILLHIMER, in  
his official capacity as Ocean County  
Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R.  
ROGERS, and ASSOCIATION OF  
NEW JERSEY RIFLE & PISTOL  
CLUBS, INC.,

Plaintiffs,  
v.

MATTHEW J. PLATKIN, in his  
official capacity as Attorney  
General of New Jersey, PATRICK J.  
CALLAHAN, in his official capacity  
as Superintendent of the New Jersey  
Division of State Police, LT. RYAN  
MCNAMEE, in his official capacity as  
Officer in Charge of the Chester Police  
Department, and KENNETH BROWN, JR.,  
in his official capacity as Chief of the Wall  
Township Police Department,

Defendants.

HON. RENÉE M. BUMB

Civil Action No.  
3:22-cv-04397

**JOINT MOTION FOR EXTENSION OF STAY PENDING APPEAL**

1. On July 30, 2024, this Court issued a memorandum opinion and a judgment and order in this case. Dkts. 228, 229. Judge Sheridan held that N.J. Stat. 2C:39-1(w)'s ban on Colt AR-15 rifles violated the Second Amendment, that its ban on certain ammunition magazines did not, and that certain other parts of this act lay outside plaintiffs' challenge. Dkt. 228 at 4-6, 69.
2. Judge Sheridan *sua sponte* stayed "the effect of this Order and Judgment ... for thirty days." Dkt. 229 at 4.
3. The undersigned parties have conferred and agreed to stipulate to extend the current stay of the effect of the Court's Order and Judgment pending appeal. The parties now move before this Court for an extension of the current 30-day stay of the District Court's July 30, 2024 Memorandum Opinion and Order until the resolution of any appeal.
4. The State hereby withdraws its prior motion, *Cheeseman* Dkt. 87, which is superseded by this joint motion.
5. A draft order reflecting the above is respectfully attached.<sup>1</sup>

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<sup>1</sup> The State requests that the caption be substituted automatically pursuant to Fed. R. Civ. P. 25(d). Former Acting Gloucester County Prosecutor Christine Hoffman retired on July 1, 2024. Elizabeth Parvin is the current Acting Gloucester County Prosecutor.

Respectfully submitted,

s/ANGELA CAI

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s/BRADLEY LEHMAN

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*COUNSEL FOR ANJRPC AND ELLMAN  
PLAINTIFFS*

August 20, 2024